

Message

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**From:** Seth Bailey [seth.bailey@ardisam.com]  
**Sent:** 11/17/2021 3:47:27 PM  
**To:** Sanchez, Rafael [Sanchez.Rafael@epa.gov]  
**CC:** Scinta, Robert [scinta.robert@epa.gov]; WoodHeaterReports [WoodHeaterReports@epa.gov]; Yellin, Patrick [Yellin.Patrick@epa.gov]; Joseph Miller [joe.miller@ardisam.com]; Michael Furseth [michael.furseth@ardisam.com]  
**Subject:** RE: Follow-up Serenity Pellet Stove Renewal

**Importance:** High  
**Flag:** Follow up

Hello Mr. Sanchez,

I hope this message finds you well. I'm writing to you as a follow-up to our call last Friday regarding the Serenity pellet stove test waiver/renewal application. As we discussed, Ardisam is a small company in a field of very large competitors. Many of our sales are to other small retail partners, as well. Stoves being a highly-seasonal product, there is a fair bit of anxiety, from all parties, surrounding the application currently before EPA. I'm hoping to get a clear sense as to where this application stands and what kind of timeline we may expect for a decision. I know you stated in our Friday discussion that you would be following-up with some colleagues regarding this application, and I am wondering if you had a chance to do so?

In considering the application, please keep in mind that 1) all Ardisam stoves have met the currently applicable emission standards ahead of effectiveness, 2) we continue to withhold all units from our sales channels, and 3) we (mistakenly) understood that we provided all information in advance of deadlines. We regret that we exceeded the effectiveness date on the original certification, but it is our sincere hope that EPA recognizes this was due to misunderstanding, and that Ardisam is doing everything it can to rectify the situation and comply with all applicable environmental standards. We are a company of individuals who recognize how fortunate we are to be in an area with clean air and water, and we seek to do what we can to protect that for ourselves, our children, and for others. Ardisam considers EPA an ally in this objective, and we trust and hope that EPA will see this for what it was, a simple mistake, and will allow Ardisam the opportunity to move forward and continue to grow. Stoves are a vital part of our business, and it would put the livelihood of those in the company in doubt should we not be able to sell the Serenity pellet stove, and do so in a timely manner.

Please let us know if there is any additional information that can be provided to support and expedite the review of this application. Any information that you can provide regarding a general timeline for this review would be tremendously helpful. We have been drowning in inquiries from retailers regarding the status of this matter, and we are at loss on how to meaningfully and honestly respond.

Thank you for your continued attention to our application. I look forward to your timely response.

Seth Bailey  
Regulatory Compliance manager  
Ardisam, Inc.  
Email: [seth.bailey@ardisam.com](mailto:seth.bailey@ardisam.com)  
Mobile: 608-332-3943

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**From:** Seth Bailey  
**Sent:** Thursday, November 4, 2021 11:58 PM  
**To:** Sanchez, Rafael <Sanchez.Rafael@epa.gov>  
**Cc:** Scinta, Robert <scinta.robert@epa.gov>; WoodHeaterReports <WoodHeaterReports@epa.gov>; Yellin, Patrick

<Yellin.Patrick@epa.gov>; Joseph Miller <joe.miller@ardisam.com>; Michael Furseth <michael.furseth@ardisam.com>

**Subject:** RE: Follow-up Serenity Pellet Stove Renewal

Mr. Sanchez,

Thank you for taking my call this afternoon and your continued review and support of this matter. When we left the call, I regretted that perhaps our approach, desire to comply, and perhaps most importantly, product meeting all applicable standards ahead of implementation, were not coming across. We hope that EPA appreciates the entirety of our context, particularly if this matter is communicated to more of your colleagues.

The combustion and emissions affecting features have remained consistent, and remain represented by, the original test results found in test report 102366578MID-002. The only improvement since this original test is a slight outlet alteration, but as discussed, the baffle plate and, therefore combustion/emissions characteristics, remain the same. The dimensions of the back access panel (to the electronics) was also updated. This access panel is categorized as a "k-list" component but has no actual combustion or emissions impact and has not been substantively changed.

I understood such changes to be eligible for renewal under the original certification as described by EPA's guidance for "Small Entity Compliance Guide for 'Standards of Performance for New Residential Wood Heaters, New Residential Hydronic Heaters and Forced-Air Furnaces.'" By contrast, the "recertification" section clarifies that recertification is appropriate if design changes affect the emissions rate:

***"As noted in §60.533(k) and §60.5475(k), the manufacturer must recertify a model line whenever any change is made in the design that affects, or is presumed to affect, the PM or carbon monoxide (CO) emission rate or efficiency for that model line (e.g., a "k list" change)."***

The "renewals" section in EPA's guidance document provides:

***"... if nothing in the model line's design has substantively changed (according to the "k list" changes presumed to affect emissions), the manufacturer may request a potential waiver from certification testing. This request must include an affirmation in writing that the heaters in the model line continue to be similar in all material respects that would affect emissions to the representative model submitted for testing (on which the original certificate of compliance was based). The manufacturer's contracted third-party certifier must review and approve the renewal application prior to its submission to EPA. If the EPA denies the renewal, the manufacturer (and retailer) must not manufacture (or sell) the previously certified heaters after the expiration date of compliance."***

After reviewing EPA's guidance document, I spoke with Brian Ziegler, the Lead Engineer at the Intertek Test Lab (our third-party verifier), that did testing for the original stove. Brian reviewed engineering drawings and design and determined:

*"Intertek has conducted this product evaluation for Ardisam, Inc., on model Serenity pellet fuel room heater, to evaluate changes to audit drawings and review for 5-year EPA certification update. The evaluation was conducted to determine if the listing report review will maintain compliance with ASTM E2515-17 - Standard Test Method for Determination of Particulate Matter Emissions Collected by a Dilution Tunnel, ASTM E2779-17 - Standard Test Method for Determining Particulate Matter Emissions from Pellet Heaters, and CSA B415.1-10 - Performance Testing of Solid-Fuel-Burning Heating Appliances. Based on the information contained and referenced herein, it is Intertek's professional judgment based on sound engineering principles that the following is true:*

- *The vent connector utilizes a baffle plate that is welded to the vent tube, which creates restriction in the venting. A reduction of 5 mm in diameter for the vent connector will not have any effect on the safety or performance of the model Serenity.*

- *The reduction of 15 mm in height for the back panel of the model Serenity has been deemed compliant. All of the ports and vents remain the same.*
- *No other changes have been made since the Serenity was originally tested in 2016; therefore, this model remains compliant with the referenced standards.”*

Per the EPA guidance document we understood to proceed with the renewal process. Intertek further determined:

*“We have completed the review of the Serenity and the listing report has been updated with the necessary information. The listing report is currently in the final review stages with our certification department. Once these reviews are complete, you will be notified when it is made active.*

*Attached are copies of the revised test report and product evaluation report for your reference.*

*The Certificate of Conformity (CoC) can be used to submit for a 5-year certification renewal with the EPA.”*

I will appreciate EPA’s consideration and support of the following:

- 1) Stoves that were produced and sold under the period covered by the original certification did **NOT** feature the proposed modifications.
- 2) Stoves with the proposed modifications were produced after Ardisam understood it had submitted all the documentation needed for the certification renewal, unaware of the delivery issues.
- 3) Stoves with the proposed modifications have been shipped to the US but have not been introduced to the market.
- 4) Third-party analysis and internal review determined that any proposed changes from the prior family do not affect emissions.
- 5) Ardisam continues to act in full transparency and urgency to supply documents, remove sales listings under our direct control and issue a stop sale order.
- 6) Ardisam understood it was appropriately following the renewal process that was the correct process to maintain compliance and certification for the Serenity pellet stove.
- 7) Intertek’s test lab personnel advised Ardisam that certificate renewal was the correct process for gaining certification for the Serenity pellet stove, given that proposed alterations would not affect emissions.
- 8) The emissions produced by stoves manufactured and sold under the original certification are equivalent to those produced by stoves with the proposed modifications.

Thank you, again, for your attention to this application. I am happy to provide further information to support your review and have attached relevant, supporting documents to this email.

Seth Bailey  
Regulatory Compliance manager  
Ardisam, Inc.  
Email: [seth.bailey@ardisam.com](mailto:seth.bailey@ardisam.com)  
Ph. 800-345-6007 Ext. 130

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**From:** Seth Bailey  
**Sent:** Friday, October 29, 2021 11:22 AM  
**To:** Sanchez, Rafael <[Sanchez.Rafael@epa.gov](mailto:Sanchez.Rafael@epa.gov)>  
**Cc:** Scinta, Robert <[scinta.robert@epa.gov](mailto:scinta.robert@epa.gov)>; WoodHeaterReports <[WoodHeaterReports@epa.gov](mailto:WoodHeaterReports@epa.gov)>; Yellin, Patrick <[Yellin.Patrick@epa.gov](mailto:Yellin.Patrick@epa.gov)>; Joseph Miller <[joe.miller@ardisam.com](mailto:joe.miller@ardisam.com)>; Michael Furseth <[michael.furseth@ardisam.com](mailto:michael.furseth@ardisam.com)>  
**Subject:** RE: Follow-up Serenity Pellet Stove Renewal

Mr. Sanchez,

Thank you for confirming that you can access the application. While we regret that this situation arose, I will appreciate any update you can provide to the immediate recertification review file as received by Mr. Yellin on 10/04/2021.

We also appreciate and share EPA's primary mission to protect the environment. As mentioned, the Serenity Pellet Stoves presented in the application have met currently applicable standards for at least 5 years ahead of the § 60.532(b) standard effectiveness. Further, Ardisam has not introduced to commerce any stoves produced outside the effective dates in the previous certification. As previously mentioned, stoves are a small but potentially growing business segment for us despite covid and supply chain related risks.

I will call you to discuss personally, but please let me know of any further information to support your review if I can't reach you over the next few working days. Thank you in advance for your continued review and support.

Seth Bailey  
Regulatory Compliance manager  
Ardisam, Inc.  
Email: [seth.bailey@ardisam.com](mailto:seth.bailey@ardisam.com)  
Ph. 800-345-6007 Ext. 130

---

**From:** Sanchez, Rafael <[Sanchez.Rafael@epa.gov](mailto:Sanchez.Rafael@epa.gov)>  
**Sent:** Thursday, October 14, 2021 12:13 PM  
**To:** Seth Bailey <[seth.bailey@ardisam.com](mailto:seth.bailey@ardisam.com)>  
**Cc:** Scinta, Robert <[scinta.robert@epa.gov](mailto:scinta.robert@epa.gov)>; WoodHeaterReports <[WoodHeaterReports@epa.gov](mailto:WoodHeaterReports@epa.gov)>; Yellin, Patrick <[Yellin.Patrick@epa.gov](mailto:Yellin.Patrick@epa.gov)>; Joseph Miller <[joe.miller@ardisam.com](mailto:joe.miller@ardisam.com)>; Michael Furseth <[michael.furseth@ardisam.com](mailto:michael.furseth@ardisam.com)>  
**Subject:** EXTERNAL- RE: Follow-up Serenity Pellet Stove Renewal  
**Importance:** High

Ok. Thank you.

**Rafael Sanchez, Ph.D.**  
**Wood Heater Program Manager**  
**Air Branch**  
**Monitoring, Assistance, and Media Programs Division**  
**Office of Compliance**  
**U.S. Environmental Protection Agency (EPA)**  
**Room 7149-D**  
**1200 Pennsylvania Ave., NW**  
**MS:2227A**  
**Washington, DC 20460**  
**Ph. 202-564-7028**  
**Teleworking on Mondays, Wednesdays, and Fridays, ph. 703-389-6568**

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**From:** Seth Bailey <[seth.bailey@ardisam.com](mailto:seth.bailey@ardisam.com)>  
**Sent:** Thursday, October 14, 2021 12:32 PM  
**To:** Sanchez, Rafael <[Sanchez.Rafael@epa.gov](mailto:Sanchez.Rafael@epa.gov)>  
**Cc:** Scinta, Robert <[scinta.robert@epa.gov](mailto:scinta.robert@epa.gov)>; WoodHeaterReports <[WoodHeaterReports@epa.gov](mailto:WoodHeaterReports@epa.gov)>; Yellin, Patrick <[Yellin.Patrick@epa.gov](mailto:Yellin.Patrick@epa.gov)>; Joseph Miller <[joe.miller@ardisam.com](mailto:joe.miller@ardisam.com)>; Michael Furseth <[michael.furseth@ardisam.com](mailto:michael.furseth@ardisam.com)>  
**Subject:** RE: Follow-up Serenity Pellet Stove Renewal

Mr. Sanchez,

Oh, I thought Patrick confirmed he was able to download them last Monday? I did receive the link and have uploaded the requested documents. Please take a look and make sure you are able to download them.

Seth Bailey  
Regulatory Compliance manager  
Ardisam, Inc.  
Email: [seth.bailey@ardisam.com](mailto:seth.bailey@ardisam.com)  
Ph. 800-345-6007 Ext. 130

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**From:** Sanchez, Rafael <[Sanchez.Rafael@epa.gov](mailto:Sanchez.Rafael@epa.gov)>  
**Sent:** Thursday, October 14, 2021 11:22 AM  
**To:** Seth Bailey <[seth.bailey@ardisam.com](mailto:seth.bailey@ardisam.com)>  
**Cc:** Scinta, Robert <[scinta.robert@epa.gov](mailto:scinta.robert@epa.gov)>; WoodHeaterReports <[WoodHeaterReports@epa.gov](mailto:WoodHeaterReports@epa.gov)>; Yellin, Patrick <[Yellin.Patrick@epa.gov](mailto:Yellin.Patrick@epa.gov)>; Joseph Miller <[joe.miller@ardisam.com](mailto:joe.miller@ardisam.com)>; Michael Furseth <[michael.furseth@ardisam.com](mailto:michael.furseth@ardisam.com)>  
**Subject:** EXTERNAL- RE: Follow-up Serenity Pellet Stove Renewal  
**Importance:** High

Mr. Bailey,

I am still not able to download your renewal files. Our IT folks say the problem is on your end. They suggested I send you a link for you to upload the files. With that in mind, I will be sending you a link soon. Please upload the files to the folder. Let me know if you have any problems. Thank you.

**Rafael Sanchez, Ph.D.**  
**Wood Heater Program Manager**  
**Air Branch**  
**Monitoring, Assistance, and Media Programs Division**  
**Office of Compliance**  
**U.S. Environmental Protection Agency (EPA)**  
**Room 7149-D**  
**1200 Pennsylvania Ave., NW**  
**MS:2227A**  
**Washington, DC 20460**

**Ph. 202-564-7028**

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**From:** Seth Bailey <[seth.bailey@ardisam.com](mailto:seth.bailey@ardisam.com)>

**Sent:** Monday, September 27, 2021 6:04 PM

**To:** Sanchez, Rafael <[Sanchez.Rafael@epa.gov](mailto:Sanchez.Rafael@epa.gov)>

**Cc:** Scinta, Robert <[scinta.robert@epa.gov](mailto:scinta.robert@epa.gov)>; WoodHeaterReports <[WoodHeaterReports@epa.gov](mailto:WoodHeaterReports@epa.gov)>; Yellin, Patrick <[Yellin.Patrick@epa.gov](mailto:Yellin.Patrick@epa.gov)>; Joseph Miller <[joe.miller@ardisam.com](mailto:joe.miller@ardisam.com)>; Michael Furseth <[michael.furseth@ardisam.com](mailto:michael.furseth@ardisam.com)>

**Subject:** RE: Follow-up Serenity Pellet Stove Renewal

Mr. Sanchez,

Thank you for your message. Please accept my sincere and anxious apology. I was unaware that my prior effort to deliver the supporting materials through a shared drive link were unsuccessful. Please allow me to try again. The following is a link to the shared file containing the materials you requested that pertain to the original certification testing. Note that I have made the contents of this link available to those with access to the [WoodHeaterReports@epa.gov](mailto:WoodHeaterReports@epa.gov) email address. If you would like me to give access to anyone else, please let me know and I will add them.

☐ [Serenity Pellet Stove Certificate Renewal Information](#)

In addition to the information you requested from the original testing and certification, and those from the renewal request for which you've already confirmed receipt, I am attaching the biennial report and the signed request letter containing the model names, certification number, and the requested compliance statement. As indicated in the letter, there have been no modifications to the previously certified stove design that would alter emissions or otherwise suggest a higher likelihood of approaching or exceeding applicable emissions standards, and Ardisam Inc. is, therefore, seeking a recertification waiver from EPA.

I greatly regret that this information did not reach you previously, and I will greatly appreciate your continued support and timely review of the materials. In the interim, I will work with our IT department to remove all listings from controlled websites where the recently manufactured units may be presented, pending EPA review. I am hopefully that this will be completed tomorrow. I am happy to support any follow-on questions you may have.

Please note that, while it does not excuse the oversight in getting you the requested documentation, all stoves produced have met the current 2020 standards, and that has been the case for 5+ years, when many of the stoves on the market were relying on the grandfathering clause for compliance. There have been no stoves introduced to commerce that were produced outside the effective dates in the previous certification, and the stove has been well received by customers and has not resulted in any defect or product integrity issues that would suggest any exceedance of environmental protection agency standards. I am happy to participate in a conference call with you if the attached information is not complete and sufficient for your issuance of the approval. If there is anything I can do to expedite the process, please let me know. Thank you in advance for your understanding with regards to this error.

Sincerely,

Seth Bailey

Regulatory Compliance manager  
Ardisam, Inc.  
Email: [seth.bailey@ardisam.com](mailto:seth.bailey@ardisam.com)  
Ph. 800-345-6007 Ext. 130

---

**From:** Sanchez, Rafael <[Sanchez.Rafael@epa.gov](mailto:Sanchez.Rafael@epa.gov)>  
**Sent:** Monday, September 27, 2021 2:21 PM  
**To:** Seth Bailey <[seth.bailey@ardisam.com](mailto:seth.bailey@ardisam.com)>  
**Cc:** Scinta, Robert <[scinta.robert@epa.gov](mailto:scinta.robert@epa.gov)>; WoodHeaterReports <[WoodHeaterReports@epa.gov](mailto:WoodHeaterReports@epa.gov)>; Yellin, Patrick <[Yellin.Patrick@epa.gov](mailto:Yellin.Patrick@epa.gov)>; Joseph Miller <[joe.miller@ardisam.com](mailto:joe.miller@ardisam.com)>; Michael Furseth <[michael.furseth@ardisam.com](mailto:michael.furseth@ardisam.com)>  
**Subject:** EXTERNAL- RE: Follow-up Serenity Pellet Stove Renewal  
**Importance:** High

Mr. Bailey,

This email is a follow-up to your email concerning the Certificate of Compliance for the Serenity pellet stove renewal. Our records show that the Certificate of Compliance for the Serenity pellet stove expired on April 21, 2021, and is thus, no longer valid. Upon reviewing Ardisam, Inc.'s website at <https://www.castlestoves.com/products/serenity-pellet-stove>, we found that you advertise and offer sale the above-referenced model.

According to the 2015 New Source Performance Standards (NSPS) for New Residential Wood Heaters (Subpart AAA) at § 60.533(i), a manufacturer must request the renewal of a model line's Certificate of Compliance every five years. See below

*Renewal of certification.* (1) The manufacturer must request renewal of a model line's certificate of compliance or recertify the model line every 5 years, or the manufacturer may choose to no longer manufacture or sell that model line after the expiration date. If the manufacturer chooses to no longer manufacture that model line, then the manufacturer must submit a statement to the Administrator to that effect.

Furthermore, according to § 60.538, a manufacturer is not permitted to advertise for sale, offer, or sell a heater that doesn't comply with the 2020 PM emissions. See below:

(c)(1) No commercial owner is permitted to advertise for sale, offer for sale or sell an affected wood heater permanently labeled under § 60.536 (b) through (d), as applicable, unless:  
(i) The affected wood heater has been certified to comply with the 2015 or 2020 particulate matter emission standards pursuant to § 60.532, as applicable.

**Therefore, within ten calendar days of receiving this email, we ask that Ardisam, Inc. cease the advertisement and sale of the above-referenced model and confirm that you will notify any distributors and retailers of the need to cease the advertising and sale of the above-referenced model.**

Finally, we are in receipt of your May 14, 2021, revised test report (March 5, 2021), and Certification of Conformity documents. However, the submitted revised test report is incomplete as raw data sheets, laboratory technician notes, calculations, and other required documentation are missing. If you don't submit a complete non-CBI revised test report at this time, we will review the test report submitted initially to obtain certification and proceed with the renewal process. In addition, Ardisam, Inc. must submit a signed request letter from an authorized company officer listing the model name(s), certification number, and a compliance statement. In the letter, if no modifications have been made since the last EPA certification, the manufacturer may request a potential waiver from certification testing. That is, you must affirm in your letter that no changes have been made to the stove that will cause wood heaters in the model line to exceed applicable emission limits. With that affirmation, you must state that Ardisam, Inc. is seeking a recertification waiver from the Agency.

Upon reviewing the submitted documentation, we will ascertain whether an updated Certificate of Compliance can be granted for the model line.

If an updated Certificate of Compliance is issued for the model line, you may resume the advertisement and sale of the model line.

If you have any further information EPA should consider with respect to the status of your Certificate of Compliance, EPA is extending you an opportunity to advise the Agency via a conference call, or in writing, of any such information. To request such an opportunity to confer, please get in touch with me at [WoodHeaterReports@epa.gov](mailto:WoodHeaterReports@epa.gov). If you have any questions, please let me know.

Would you please acknowledge receipt of this email?

**Rafael Sanchez, Ph.D.**  
**Wood Heater Program Lead**  
**Air Branch**  
**Monitoring, Assistance, and Media Programs Division**  
**Office of Compliance**  
**U.S. Environmental Protection Agency (EPA)**  
**Room 7149-D**  
**1200 Pennsylvania Ave., NW**  
**MS:2227A**  
**Washington, DC 20460**  
**Ph. 202-564-7028**  
**Teleworking on Mondays, Wednesdays, and Fridays, ph. 202-844-6993**

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**[WoodHeaterReports@epa.gov](mailto:WoodHeaterReports@epa.gov)**



Are you looking for a wood heater or central heater? Please try our fully searchable [EPA Certified Wood Heater Database \(https://www.epa.gov/compliance/epa-certified-wood-heater-database\)](https://www.epa.gov/compliance/epa-certified-wood-heater-database).

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**From:** Sanchez, Rafael  
**Sent:** Friday, May 14, 2021 12:39 PM  
**To:** Seth Bailey <[seth.bailey@ardisam.com](mailto:seth.bailey@ardisam.com)>  
**Cc:** Yellin, Patrick <[Yellin.Patrick@epa.gov](mailto:Yellin.Patrick@epa.gov)>; Scinta, Robert <[scinta.robert@epa.gov](mailto:scinta.robert@epa.gov)>  
**Subject:** RE: Certification renewal process  
**Importance:** High

Mr. Bailey,

.zip files may work, depending on size. Also, dropbox or FTP can be used. Regarding the sales data, submit only the last two years.

Rafael Sanchez, EPA

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**From:** Seth Bailey <[seth.bailey@ardisam.com](mailto:seth.bailey@ardisam.com)>  
**Sent:** Friday, May 14, 2021 11:57 AM  
**To:** Sanchez, Rafael <[Sanchez.Rafael@epa.gov](mailto:Sanchez.Rafael@epa.gov)>  
**Cc:** Yellin, Patrick <[Yellin.Patrick@epa.gov](mailto:Yellin.Patrick@epa.gov)>; Scinta, Robert <[scinta.robert@epa.gov](mailto:scinta.robert@epa.gov)>  
**Subject:** RE: Certification renewal process

Rafael,

Thank you very much for the prompt response. That answers most of my questions, but I have two follow-up questions:

- 1) Do you accept .zip or .rar files? Looking at the data, it appears the files amount to 60-70 MBs if I'm including all the supporting files. I know some email security systems reject compression files, and I just want to make sure that's not the case for EPA.
- 2) For the biennial report, would you like my to include the previous two years of sales, or do you just want the last year (starting from the where the previous biennial report I submitted left-off and carrying through the end of the certification period)?

Seth Bailey  
Regulatory Compliance manager  
Ardisam, Inc.  
Email: [seth.bailey@ardisam.com](mailto:seth.bailey@ardisam.com)  
Ph. 800-345-6007 Ext. 130

---

**From:** Sanchez, Rafael <[Sanchez.Rafael@epa.gov](mailto:Sanchez.Rafael@epa.gov)>  
**Sent:** Friday, May 14, 2021 10:40 AM  
**To:** Seth Bailey <[seth.bailey@ardisam.com](mailto:seth.bailey@ardisam.com)>  
**Cc:** Yellin, Patrick <[Yellin.Patrick@epa.gov](mailto:Yellin.Patrick@epa.gov)>; Scinta, Robert <[scinta.robert@epa.gov](mailto:scinta.robert@epa.gov)>  
**Subject:** EXTERNAL- RE: Certification renewal process  
**Importance:** High

Mr. Bailey,

Thank you for your email. To get your renewal processed, please submit the following documents:

1. Full revised test report including raw data and supporting documentation.
2. Certification of conformity updated (CoC must include a summary table showing all revisions made to the report).
3. Last certificate of compliance.
4. Signed letter from your Company stating that you are seeking renewal and affirming in writing that the wood heaters in the model line continue to be similar in all material respects that would affect emissions to the representative wood heater submitted for testing on which the original certificate of compliance was based and requesting a potential waiver from certification testing.
5. Biennial report. Sales data for the model for the last two years.

Please submit the revised test reports (both CBI and non-CBI), signed letter, sales data, and Certification of Conformity to [WoodHeaterReports@epa.gov](mailto:WoodHeaterReports@epa.gov). If you have any questions, please let me know.

**Rafael Sanchez, Ph.D.**  
**Wood Heater Program Lead**  
**Air Branch**  
**Monitoring, Assistance, and Media Programs Division**  
**Office of Compliance**  
**U.S. Environmental Protection Agency (EPA)**  
**Room 7149-D**  
**1200 Pennsylvania Ave., NW**  
**MS:2227A**  
**Washington, DC 20460**  
**202-564-7028**  
**202-564-0050 fax**  
**Teleworking on Mondays, Wednesdays, and Fridays (571-236-1927)**

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**[WoodHeaterReports@epa.gov](mailto:WoodHeaterReports@epa.gov)**

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**From:** Seth Bailey <[seth.bailey@ardisam.com](mailto:seth.bailey@ardisam.com)>  
**Sent:** Friday, May 14, 2021 11:01 AM  
**To:** Sanchez, Rafael <[Sanchez.Rafael@epa.gov](mailto:Sanchez.Rafael@epa.gov)>  
**Subject:** Certification renewal process

Hello Mr. Sanchez,

I have been working with the Intertek test lab that certified our Castle Serenity pellet stove for EPA emissions approximately 5 years back on emission certification renewal. Intertek has provided the attached documents in support of certificate renewal.

The engineer at Intertek, Brian Ziegler, suggested that I reach out to you to inquire as to what information you need for a certification renewal and how you would like that information to be submitted. He also said to mention that since we were going through the review process for the purpose of renewal, that there were some issues with many industry reports found by an ADEC review, and he wanted me to let you know that the attached revised report corrects those issues.

If you would kindly let me know whether you need more information in addition to what is attached in this email, as well as how you would like the information submitted, that would be very much appreciated. I want to make sure I'm not missing anything needed for your review.

Thank you very much in advance,

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